CAO TEAM PROCEDURE
Carlsbad Area Office

TP No. 3.2 Page 1 of 6

Revision 1

Title: **TREND IDENTIFICATION AND REPORTING**

Manager, Carlsbad Area Office

12/6/99
Effective Date

1.0 PURPOSE

This procedure defines responsibilities and establishes a method for identifying and reporting trends in the area of deficiencies and the associated corrective action activities.

2.0 SCOPE

This method for identifying and reporting trends shall be used to evaluate potential trends in Corrective Action Reports (CARs), items Corrected During Audits (CDAs) and audit items identified during Carlsbad Area Office (CAO) audits of the WIPP Project Participants in accordance with requirements contained in the CAO Quality Assurance Program Description (QAPD) and the WIPP Hazardous Waste Facility Permit. This procedure supercedes TP 3.2, Revision 0.

3.0 REFERENCES AND DEFINITIONS

3.1 References

3.1.1 U.S. Department of Energy Carlsbad Area Office, Quality Assurance Program Document, (QAPD) CAO-94-1012.

3.1.2 CAO Management Procedure (MP) 3.1, Corrective Action Reporting

3.1.3 WIPP Hazardous Waste Facility Permit

3.2 Definitions

Terms in this procedure are used as defined below.

3.2.1 *Adverse Trend* - Repetitive occurrences of the same or similar problems which, if uncorrected, could have a serious effect on public and worker safety or the ability to isolate waste or maintain compliance with applicable federal and state requirements.

3.2.2 *Responsible Organization* - Any organization that implements the CAO QAPD and is identified as having a potential trend.

3.2.3 *Potential Trend* - A potential trend is identified when three (3) or more CARs/CDAs exist in any organization for a specific or related deficiency.

3.2.4 *Corrective Action Report* (CAR) - A document utilized to identify and document conditions adverse to quality (CAQ) and track the associated corrective actions.

3.2.5 *Corrected During the Audit (CDA*) - Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and correction of the deficiency can be verified prior to the end of an audit.

4.0 RESPONSIBILITIES

4.1 CAO Quality Assurance (QA) Manager - Responsible for the preparation and maintenance of this Procedure. The CAO QA Manager retains overall responsibility for the trending and reporting of quality problem areas.

4.2 CAO CAR Coordinator - Responsible for review of CARs, CDAs, and other audit items to determine potential CAO and participant program trends.

4.3 Assessment Team Leader - Responsible for providing to the CAR coordinator the CDA Form, describing the deficiency corrected during the Audit/Assessment.

4.4 Responsible Organization - Responsible for addressing potential trends identified as a result of the trending process.

5.0 PROCEDURE

The CAR Coordinator, with the assistance of the Assessment Team Leader, validates trend cause codes assigned to deficiencies (CARs and CDAs).

The trend cause codes will be assigned to CDAs.

The trend cause codes will be assigned to CARs upon closure of the CAR.

5.1 Trending Data Collection

5.1.1 The CAR Coordinator will perform a semiannual review of deficiencies (CARs and CDAs) identified during the previous six (6) month period. The review will be performed on CARs closed during this period and CDAs and other audit items identified during this period.

5.1.2 The CAR Coordinator will group the deficiencies by trend cause code and responsible organization.

5.1.3 When three (3) or more deficiencies within the same organizations or other audit items are identified (during the review) within the same organization and trend code, the responsible organization will be formally notified.

5.1.4 During the semiannual trending review the CAR Coordinator will also review other audit items (observations, recommendations, and exemplary practices) as contained in assessment reports from the affected period. Any noticeable trends identified will also be addressed in the trend report.

NOTE: Nonconformance Reports (NCRs) received from the generator sites will be summarized on a monthly basis, indicating the previous month's NCRs received. This summary will be transmitted to NMED. NCRs received from TRU waste generator/storage sites are not considered in the trending report.

5.2 Trend Reporting

5.2.1 The CAR Coordinator will prepare (semi-annually) a Trending Report that identifies the number of deficiencies by trend cause code, and by responsible organization.

5.2.2 The report will summarize the trends identified.

5.2.3 The responsible organizations that are identified as having, within their program, a potential trend will conduct investigations as necessary to appropriately determine whether or not an actual trend exists. CAO will be provided the results of the responsible organization's investigation.

5.2.4 The CAR Coordinator will submit the draft Trending Report to the CAO QA Manager.

5.2.5 The CAO QA Manager will review the draft report, and once approved, authorizes distribution to the following as a minimum:

A. CAO Manager
B. Responsible Organizations
C. CAO Team Leaders

6.0 RECORDS

The following document is considered to be a nonpermanent QA record and shall be maintained in accordance with MP 4.5 and MP 4.9:

Trending Reports

7.0 ATTACHMENTS

I. CAO Trend Codes

II. Trending Report Guidance

III. Flow Charts

CAO Trend Cause Codes

1. Equipment/Material

1.1 Defective or failed part
1.2 Defective or failed material
1.3 Error by manufacturer in shipping or marking
1.4 Contamination

2. Procedure

2.1 Inadequate procedure
2.2 Lack of procedure

3. Personnel Error

3.1 Inadequate work environment
3.2 Inattention to detail
3.3 Violation of procedure requirement
3.4 Communication problem
3.5 Other human error

4. Design Failure

4.1 Inadequate or defective design
4.2 Error in equipment or material selection
4.3 Drawing, specification or data error

5. Training Deficiency

5.1 No training provided
5.2 Inadequate presentation, material or content
5.3 Insufficient refresher training
5.4 Insufficient on-the-job-training

6. Management Problem

6.1 Inadequate administrative control
6.2 Work organization/planning deficiency
6.3 Inadequate supervision
6.4 Improper resource allocation
6.5 Policy not adequately defined, disseminated or enforced
6.6 Other management problem

Trending Report Guidance

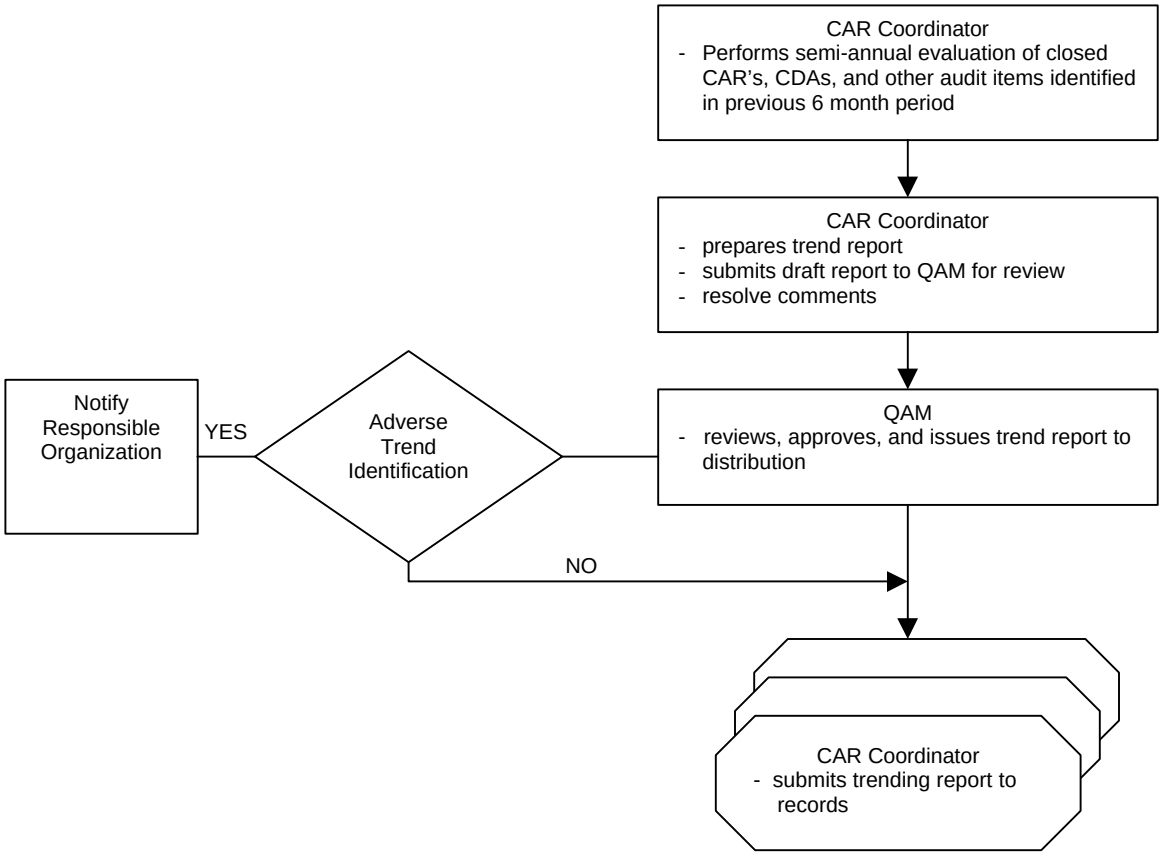
The Trending Report provides the Carlsbad Area Office management with information related to trending activities. The report identifies adverse quality trends discovered as a result semiannual review activities. The Trending Report is a management tool to ensure identification and correction of the root cause of repetitive or similar deficiencies in the QA program.

The Trending Report shall contain:

A. An executive summary identifying:
- Conclusions reached as a result of trending activities

B. Figures/charts showing:
- Number of deficiencies issued over the previous 6 month period by trending code
- Number of deficiencies and other audit items issued by organization
- Number of CARs closed during the 6 month period

Flow Chart



LEGEND
QAM – Quality Assurance Manager
CAR Coordinator
CARs –Corrective Action Reports
CDAs- Corrected During Audit